

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Sonja B. Wallace	)	Case Number 16-30494-KLP
Debtor	)	Chapter 7
	)	
	)	

**MOTION TO REOPEN CASE**

COMES NOW, the Debtors, Sonja B. Wallace, by counsel and hereby moves this Court to reopen case. In support of said Motion, the Debtor states the following:

1. That the Debtor filed a Chapter 7 bankruptcy on February 8, 2016.
2. That her case was discharged on May 23, 2016 and closed on May 31, 2016.
3. That the Debtor had two liens placed on her prior to filing of her bankruptcy, specifically Virginia Credit Union and GMAC.
4. That the Debtor desire to have the liens avoided in order to increase her credit score and allow her to refinance her home.

WHEREFORE, the Debtor, by Counsel, moves the Court to enter an Order to reopen this case.

September 18, 2020

RESPECTFULLY SUBMITTED,

Sonja B. Wallace

By: /s/: Joseph Massie, III  
Of Counsel

I ask for this:

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)

Sonja B. Wallace  
Debtor

16-30494-KLP  
Chapter 7

Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)  
(804) 644-4874 (F)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing Motion to Reopen Case was served to all necessary parties.

September 18, 2020

By: /s/: Joseph Massie, III

Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
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(804) 644-4878 (T)  
(804) 644-4874 (F)

Debtor  
Sonja B. Wallace  
1070 Saint Ann's Drive  
Richmond, VA 23225

Trustee  
Lynn L. Tavenner  
20 North Eighth Street, Second Floor  
Richmond, VA 23219

BB & T  
P.O. Box 1290  
Whiteville, NC 28472

Capital One Bank Usa N  
15000 Capital One Dr  
Richmond, VA 23238

Carmax Auto Finance  
2040 Thalbro St  
Richmond, VA 23230

Sonja B. Wallace  
Debtor

16-30494-KLP  
Chapter 7

Dept Of Education/Neln  
121 S 13th St  
Lincoln, NE 68508

Syncb/Jcp  
Po Box 965007  
Orlando, FL 32896

Syncb/Walmart  
Po Box 965024  
Orlando, FL 32896

Virginia Credit Union  
P. O. Box 90010  
Richmond, VA 23225

West Creek Financial  
P. O. Box 5518  
Foster, VA 23056

GMAC  
P.O. Box 2150  
Greeley, Co. 80632

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**IN THE UNITED STATES BANKRUPTCY COURT  
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IN RE:  
Sonja B. Wallace

} Case No. 16-30494-KLP  
} Chapter 7  
}

**NOTICE OF MOTION-NOTICE OF HEARING**

Debtor, by counsel, has filed a motion with the court to vacate dismissal of her case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.**

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before **October 14, 2020 at 10:00 am**, you or your attorney must:

- ✓ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.
- ✓ Attend the hearing on the motion scheduled to be held on **October 14, 2020, at 10:00 am**, at the United States Bankruptcy Court, Judge Phillips Courtroom; 701 East Broad Street, Room 5100, Richmond, Virginia 23219.

**Clerk of Court  
United States Bankruptcy Court  
701 E. Broad Street, Room 4000  
Richmond, VA 23219**

**You must also mail a copy to:**

**Joseph S. Massie, III  
Massie Law Firm, P.C.  
102 E. Cary Street  
Richmond, Virginia 23219**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: September 18, 2020

/s/ Joseph S. Massie, III  
Joseph S. Massie, III, VSB#35472  
Massie Law Firm, P.C.  
Attorney for the Debtor  
102 E. Cary Street  
Richmond, Virginia 23219  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)  
[www.massielawfirm.com](http://www.massielawfirm.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 2020 I sent, electronically, or mailed a true and exact copy of the foregoing **Notice of Motion** to all necessary parties.

RESPECTFULLY SUBMITTED  
Sonja B. Wallace

/s/ Joseph S. Massie, III  
Joseph S. Massie, III, VSB#35472

Sonja B. Wallace  
1070 Saint Ann's Drive  
Richmond, VA 23225

*Trustee*  
Lynn L. Tavenner  
20 North Eighth Street, Second Floor  
Richmond, VA 23219

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Office of the U.S. Trustee  
701 East Broad Street  
Suite 4300  
Richmond, VA 23219-0000